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June 2, 2022

Hon. Colleen McMahon
United States District Judge
500 Pearl Street
New York, NY 10007

Re: United States v. Jorge Espino Hernandez, 20 Cr. 659 (CM)

Dear Judge McMahon:

I am counsel for Mr. Jorge Espino Hernandez, who is scheduled to appear for a status conference on June 15, 2022.

AUSA Rushmi Bhaskaran and I respectfully request an adjournment of the conference for approximately sixty days. We expect to resolve this matter without a trial, and we are engaged in plea negotiations.

The parties respectfully request that time be excluded from June 15, 2022, until the new conference date under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), to permit the parties to continue discussing a potential pretrial disposition of the case and allow the defense additional time to review discovery materials.

Sincerely,

/s/

Donald J. Yannella, Esq.

6/2/22

Case Adjourned to August 8, 2022

At 2:30 p.m. ← time excluded

through August 8, 2022 the interest

of justice, to facilitate plea discussions
pursuant to 18 U.S.C. § 3161(h)(7)(A)

So ordered.
J. A. J.
6/2/22 Part I